



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

FTB/AFP
F. #2017R00175

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 11, 2024

By E-mail

Officer Brian Woo
United States Probation Department
Eastern District of New York
147 Pierrepont Street
Brooklyn, NY 11201

Re: United States v. Kara Sternquist
Criminal Docket No. 22-473 (DLI)

Dear Officer Woo:

The government is in receipt of the Presentence Investigation Report dated March 29, 2024 in the above-referenced case (the "PSR"). The government offers the following observations and proposed revisions for your consideration.

Paragraph 18. The government notes that it is in possession of complaint reports generated by the New York City Police Department ("NYPD") concerning certain pieces of identification and credit cards in the names of third parties that were recovered from the defendant's residence. Specifically, at least four individuals had made formal complaints to the NYPD concerning lost or stolen New York State driver's licenses and credit cards (one complaint did not reference lost or stolen property, but did report unauthorized bank withdrawals). Driver's licenses in the names of each of these individuals (and in some cases, credit cards in the names of the individuals) were among the items recovered from the defendant's residence. The relevant NYPD complaint reports were produced to the defendant and are referenced in the government's discovery letter dated March 7, 2023 (ECF No. 67). The government respectfully requests that the PSR be amended to reflect this information.

Paragraph 19. The PSR indicates that the "Government provided three lab reports from the Bureau of Alcohol, Tobacco, Firearms, and Explosives ('ATF')"

There are actually four relevant lab reports, and the fourth is being provided with this letter.¹ The fourth report contains analysis of ATF exhibit numbers 2, 11, 16, and 17 and concludes that each is a “firearm” within the meaning of 18 U.S.C. § 921(a)(3). This additional report does not change the sentencing enhancement in the PSR under Guideline section 2K2.1(b)(1)(B) because the total number of recovered firearms (23) remains more than 8, but less than 24. See PSR ¶ 29. The government respectfully requests that the PSR be amended to reflect this information and apologizes for any confusion.

Paragraph 22. The government notes that according to the relevant ATF report referenced in this paragraph, each of the four firearms was successfully test fired by the ATF either as it was found in the defendant’s apartment or with only minor modifications (e.g., for exhibit 20, the replacement of the connector – a process that took approximately three minutes and required a piece of equipment that retails for approximately \$5). The firearms were therefore effectively operable. The government respectfully requests that the PSR be amended to reflect this information.

Paragraph 69. This paragraph concludes with the observation that the “defendant has not been subject to any disciplinary incidents since her arrest.” In fact, the U.S. Marshals Service suspended the defendant’s in-person visitation privileges at the Rehabilitation and Nursing Center where she is currently housed in January 2023 after the discovery of shredded pieces of a soda can found underneath the defendant’s personal items in a small cabinet within her reach. See ECF No. 72. The suspension did not affect personal telephone calls, attorney telephone calls, or attorney visits. The defendant’s visitation privileges were reinstated in June 2023.

In addition, the defendant was found to have concealed one pill of oxycodone and one pill of morphine in empty chap-stick containers on June 13, 2023 while at the Rehabilitation and Nursing Center. On October 1, 2023, security personnel employed by the Marshals found surgical scissors hanging from the call bell cord at the bedside of the defendant at the Rehabilitation and Nursing Center. The government respectfully requests that the PSR be amended to reflect these incidents of contraband possession.

¹ Each of the four ATF lab reports has been produced to the defendant in discovery. See ECF Nos. 65, 66, 68, and 70.

* * *

Thank you for your consideration of these comments and proposed revisions.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ F. Turner Buford
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Enclosure

cc: Allegra Glashausser, Esq. (by ECF and Email)
Clerk of the Court (DLI) (by ECF and Hand)